

# EXHIBIT 25

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UNITED STATES DISTRICT COURT  
  
WESTERN DISTRICT OF WASHINGTON  
  
RICARDO SALOM, CATHERINE PALAZZO )  
as assignee for RUBEN PALAZZO, )  
and PETER HACKINEN, on their own )  
behalf and on behalf of others )  
similarly situated persons, )  
Plaintiffs, ) CASE NO.  
vs. ) 2:24-cv-00444-BJR  
NATIONSTAR MORTGAGE, LLC, )  
Defendant. )  
\_\_\_\_\_ )

VIDEOTAPED ZOOM DEPOSITION OF CATHERINE PALAZZO  
  
WEDNESDAY, FEBRUARY 12, 2025  
  
Reported by: Shelley Lynn Schniepp  
CSR No. 5487  
Job No.: 314152

1 A. Yes, I am. 14:32:40

2 Q. Mr. Cooper has notes in its system. This is a 14:32:44

3 printout related to your loan. Do you see the name 14:32:48

4 identified with the loan number in the upper left-hand 14:32:51

5 corner here? 14:32:54

6 A. Yes. 14:33:01

7 Q. That has your husband's name and your property 14:33:01

8 address, right? 14:33:04

9 A. Yes. 14:33:05

10 Q. I'm going to scroll down to where I see a 14:33:10

11 notation about payoff quote. It appears on September 14:33:13

12 11, 2023 at 10:56 in the morning. It says web instant 14:33:16

13 payoff quote. Do you see that? 14:33:27

14 A. Yes. 14:33:30

15 Q. It has your husband's name. Is that because 14:33:30

16 he's the one who actually requested it? 14:33:32

17 A. I would assume it's because the note is in his 14:33:38

18 name. 14:33:41

19 Q. Do you recall whether you were the one who 14:33:42

20 went onto the website to request this payoff quote or 14:33:45

21 your husband? 14:33:48

22 A. We did it together. 14:33:49

23 Q. So you're sitting side by side? 14:33:50

24 A. Yes. 14:33:53

25 Q. In your dining room, like right where you are 14:33:53

1 today? 14:34:01

2 A. Actually, yes. 14:34:01

3 Q. You request a payoff quote. Do you recall the 14:34:02

4 steps that you took in order to request a payoff 14:34:07

5 quote? 14:34:10

6 A. I could not tell you the steps. I know we 14:34:12

7 logged on. There was a section you can click on that 14:34:15

8 requests the payoff. I don't remember the exact 14:34:18

9 steps. 14:34:21

10 Q. Do you recall there being a statement that if 14:34:22

11 you wanted an expedited payoff there would be a \$25 fee 14:34:26

12 associated with it? 14:34:33

13 A. I don't recall anything about it being 14:34:34

14 expedited. I just recall it saying there was a fee of 14:34:37

15 \$25. I don't exactly recall the wording. 14:34:40

16 Q. You clicked yes and then that processed the 14:34:45

17 request for Nationstar to generate the payoff quote? 14:34:49

18 A. Correct. 14:34:52

19 Q. So you understood that there would be a fee 14:34:55

20 associated with it when you requested it? 14:34:58

21 A. I figured that was the only way I can get it 14:35:02

22 so I agreed to it. 14:35:04

23 Q. What does the word expedited mean to you? 14:35:08

24 A. It means rushed. 14:35:11

25 Q. You wanted this payoff quote quickly and 14:35:16

1 that's why you requested it to be rushed? 14:35:19

2 A. We wanted to know what it was right away 14:35:22

3 because we were making plans. 14:35:24

4 Q. What was the purpose of requesting it quickly? 14:35:30

5 What were the plans you wanted to make? 14:35:33

6 A. We were considering refinancing. 14:35:35

7 Q. What steps did you take to refinance? 14:35:41

8 A. We stopped there when we saw there was fees on 14:35:45

9 the payoff that, again, we didn't know what they 14:35:48

10 were. 14:35:53

11 Q. So after receiving the payoff quote you did 14:35:57

12 not take any steps to contact any potential lenders? 14:36:01

13 A. No. 14:36:10

14 Q. Did you at any point apply for a refinance 14:36:10

15 while Nationstar was servicing this loan? 14:36:15

16 I'm sorry. You froze. Did you answer? 14:36:31

17 A. I said no. 14:36:33

18 Q. Then we have the web instant payoff quote, 14:36:39

19 appears on NSM 5876. It identifies a fee for expedited 14:36:47

20 delivery of \$25. Do you see that? 14:37:00

21 A. I do. 14:37:02

22 Q. Do you know if you ever paid that fee? 14:37:05

23 A. I did. I paid it with my next statement when 14:37:08

24 I received it. 14:37:13

25 Q. Is Nationstar still servicing this loan? 14:37:26

1 A. Yes. 14:37:32

2 Q. Have you had any communications with 14:37:32

3 Nationstar since your filing of this lawsuit? 14:37:35

4 A. Define communication. 14:37:40

5 Q. Did you ever call them? 14:37:43

6 A. No. I've sent them notes with my payments to 14:37:47

7 make sure the payments are applied properly. 14:37:50

8 Q. Anything else? 14:37:56

9 A. Other than they keep applying my payments 14:37:59

10 where they're not supposed to, no. 14:38:02

11 MR. MANNING: The next document we'll mark as 14:38:21

12 Exhibit 8. It's another document of Mr. Cooper that 14:38:23

13 tracks payments, debits, credits on the account. 14:38:27

14 (Exhibits 7 and 8 were marked.) 14:38:40

15 BY MR. MANNING: 14:38:41

16 Q. I want to bring your attention to the same 14:38:41

17 date we were just looking at, 9/11/23. You'll see that 14:38:43

18 \$25 fee for the expedited delivery. 14:38:48

19 A. I see that. 14:38:53

20 Q. Then it appears that that was paid on 14:38:58

21 September 14th. Does that refresh your -- 14:39:05

22 MR. ROBINSON: Hold on, Jason. 14:39:15

23 THE WITNESS: Yep. 14:39:22

24 MR. ROBINSON: Avoid expressions like yep. 14:39:24

25 BY MR. MANNING: 14:39:28

1 Q. The payment appears to be have been made on 14:39:28  
2 September 14th, 2023. Does that refresh your memory as 14:39:31  
3 to when you would have paid the expedited delivery 14:39:34  
4 fee? 14:39:37  
5 A. Yes. I included it with my next payment that 14:39:38  
6 I sent out and that would have been the payment that 14:39:40  
7 would have gone out. 14:39:42  
8 MR. MANNING: This will be Exhibit 9. 14:39:56  
9 (Exhibit 9 was marked.) 14:40:01  
10 BY MR. MANNING: 14:40:01  
11 Q. This is a payoff statement. You will see it's 14:40:01  
12 from Right Path and it's to your husband at the 14:40:04  
13 property address, correct? 14:40:07  
14 A. Correct. 14:40:09  
15 Q. It has a statement date of September 11, 2023, 14:40:10  
16 and if we scroll down you'll see that there's a 14:40:17  
17 breakdown of the payoff, correct? 14:40:24  
18 A. Correct. 14:40:28  
19 Q. Among the various items in the breakdown it 14:40:32  
20 lists the expedited delivery fee of \$25? 14:40:35  
21 A. Yes, I see that. 14:40:39  
22 Q. This is the statement that you received after 14:40:42  
23 the instant payoff quote was processed? 14:40:44  
24 A. Yes, that is correct. 14:40:51  
25 Q. I understood your testimony to be that there 14:40:53

1                   You can answer if you can.                   14:42:25

2                   THE WITNESS: I prefer not to. I think I've           14:42:28

3                   already answered that question.                   14:42:30

4                   MR. ROBINSON: You have to answer the question       14:42:33

5                   unless I tell you not to. I'm objecting for the       14:42:34

6                   record.                   14:42:37

7                   Answer the question if you can.                   14:42:38

8                   THE WITNESS: We wanted the payoff right away       14:42:40

9                   so we agreed to it to get it right away. I've never   14:42:43

10                  seen there be a fee for any kind of payoffs before.   14:42:47

11                 BY MR. MANNING:                   14:42:55

12                 Q. We're done with that one.           14:42:55

13                 I know you mentioned your regular monthly   14:43:02

14                 payment. I wanted to show you the informational   14:43:05

15                 statement from Right Path. We'll mark this as   14:43:05

16                 Exhibit 10. It's a statement dated September 15, 2023   14:43:09

17                 with the same loan number addressed to your husband at   14:43:14

18                 the property address, correct?           14:43:17

19                 A. Yes.                   14:43:19

20                 (Exhibit 10 was marked.)           14:43:31

21                 BY MR. MANNING:                   14:43:31

22                 Q. It has variety of information about fees, et   14:43:31

23                 cetera.                   14:43:35

24                 A. Yes.                   14:43:35

25                 Q. If we go towards the bottom of the document,   14:43:35

1 BY MR. MANNING: 14:45:14

2 Q. Just so the record is clear, the September 11, 14:45:14

3 2023 date is consistent in the transaction history, the 14:45:18

4 servicing notes, the payoff quote and the monthly 14:45:25

5 statement that we've all looked at, correct? 14:45:27

6 A. Correct. 14:45:31

7 Q. Do you recall how long it took for that payoff 14:45:58

8 quote to be sent to you? 14:46:00

9 A. We got it the same morning we requested it. 14:46:02

10 We received it and then the statement came in the 14:46:06

11 mail. 14:46:11

12 Q. It looked like on the web it was requested at 14:46:11

13 10:56. I know you said morning, but do you recall what 14:46:19

14 time it was? 14:46:23

15 A. No. 14:46:26

16 Q. Do you know if it was still morning when you 14:46:26

17 actually received the instant payoff quote? 14:46:30

18 A. It was -- we were sitting together when we 14:46:34

19 requested it. It was not even a few minutes later we 14:46:39

20 got. It was like a minute -- we requested it and we 14:46:42

21 got it. 14:46:46

22 Q. So the expedited service succeeded? You got 14:46:47

23 it rushed quickly, right? 14:46:51

24 MR. ROBINSON: Objection. 14:46:54

25 THE WITNESS: We asked for it, we got it. 14:46:55

1 BY MR. MANNING: 14:46:58

2 Q. That was the service that you requested, 14:46:58

3 right? 14:47:00

4 A. Yes. 14:47:03

5 Q. And you understood that to have it rushed 14:47:03

6 there was a fee associated with it, right? 14:47:06

7 MR. ROBINSON: Objection. 14:47:09

8 THE WITNESS: I don't recall it being 14:47:10

9 expedited though. I just remember there being a fee. 14:47:12

10 BY MR. MANNING: 14:47:27

11 Q. In your experience when you want something 14:47:27

12 rushed there's often a fee associated with it, right? 14:47:31

13 MR. ROBINSON: Objection. 14:47:36

14 THE WITNESS: Not necessarily. 14:47:38

15 BY MR. MANNING: 14:47:40

16 Q. Have you ever used Federal Express? 14:47:40

17 A. Yes, and I use it every month when I send my 14:47:44

18 payments out to your client and I don't pay any 14:47:47

19 different if I send it next day or second day. 14:47:51

20 Q. So in your experience if you used U.P.S., the 14:47:55

21 United States Postal Service, what we call snail mail, 14:48:01

22 it costs the same as Federal Express which will deliver 14:48:05

23 it the next day? 14:48:09

24 A. I have no idea what U.P.S. or USPS costs. 14:48:11

25 I've always used Fed Ex. 14:48:16

1 STATE OF CALIFORNIA

2 COUNTY OF SAN DIEGO

3

4 I, SHELLEY LYNN SCHNIEPP, do hereby certify:

5

6 That I am a duly qualified Certified Shorthand  
7 Reporter, in and for the State of California, holder of  
8 certificate number 5487, which is in full force and  
9 effect and that I am authorized to administer oaths and  
10 affirmations;

11 That the foregoing deposition testimony of the  
12 herein named witness was taken before me at the time  
13 and place herein set forth;

14 That prior to being examined, the witness named  
15 in the foregoing deposition, was duly sworn, or  
16 affirmed by me, to testify to the truth, the whole  
17 truth, and nothing but the truth;

18 That the testimony of the witness and all  
19 objections made at the time of the examination were  
20 recorded stenographically by me, and were thereafter  
21 transcribed under my direction and supervision;

22 That the foregoing pages contain a full, true and  
23 accurate record of the proceedings and testimony to the  
24 best of my skill and ability;

25

1 I further certify that I am not a relative or  
2 employee or attorney or counsel of any of the parties,  
3 nor am I a relative or employee of such attorney or  
4 counsel, nor am I financially interested in the outcome  
5 of this action.

6  
7 IN WITNESS WHEREOF, I have subscribed my name this  
8 1st Day of March, 2025.

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13 SHELLEY LYNN SCHNIEPP, CSR No. 5487  
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